

Written Testimony of Diane L. Ethier

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Testimony in support of Raised House Bill No. 6496: An Act Concerning Green Cleaning Products in Schools

Senator Gaffey, Representative Fleischmann and members of the Education Committee:

My name is Diane Ethier and I represent the CT Foundation for Environmentally Safe Schools (ConnFESS). I am testifying in strong support of Raised Bill No. 6496: AAC Green Cleaning Products in Schools. The primary focus of ConnFESS has always been and will continue to be educating the public on school environmental health issues. We have two main messages: 1) Indoor environmental quality (IEQ) issues can dramatically impact the long-term health of school occupants and the quality of education that students receive and 2) Healthier indoor environments in schools will lead to improved health for students and staff and ultimately lead to improved attendance, performance and productivity. The use of Green Cleaning products and practices reduces exposures to toxic chemicals and is a critical step in cleaning up indoor environments in schools.

I am a retired high school mathematics teacher. Since my retirement in 2003, I have been educating school stakeholders to identify and resolve indoor air quality (IAQ) problems and reduce asthma triggers in schools. I am an IAQ mentor and presenter for the National Education Association Health Information Network (NEAHIN) and NEA's representative to the School Subcommittee of the National Institutes of Health's National Asthma Education and Prevention Program (NAEPP). Asthma is the leading cause of student absenteeism and a leading occupational disease of teachers and custodians—*that is, they get it on the job*. Schools with healthier indoor air report fewer asthma attacks, fewer incidents of bronchitis and upper respiratory illnesses, better attendance and fewer visits to the school nurse. The NAEPP School Subcommittee develops resources for school personnel on how to create an "Asthma-Friendly School," a school that:

1. Adopts and enforces a tobacco-free policy that prohibits tobacco use at all times, on all school property, by all people and for all school activities
2. Uses integrated pest management techniques to control pests
3. **Uses the least toxic products available**
4. **Develops an IAQ management plan for preventing or reducing IAQ problems and allergens or irritants that make asthma worse: tobacco smoke, chalk dust, dust mites, mold, mildew, cockroaches and other pests, insect and pet dander, strong odors or fumes from such products as pesticides, paint, perfumes and cleaning chemicals, scented products, and dust and debris from clutter, construction/renovation**
5. **Uses good housekeeping and maintenance practices**
6. Reduces students' exposure to diesel bus exhaust at all times

I am the ConnFESS representative to the CT School Indoor Environment Resource Team (CSIERT or Resource Team). Other CSIERT member organizations that are actively supporting HB 6496 include the American Lung Association of CT, the Connecticut Education Association, the CT Federation of School Administrators and the CT Parent Teacher Association. The Resource Team provides free training to school districts across the state on both the EPA's IAQ Tools for Schools program and the CSIERT Cleaning for Health Program. The Resource Team helps school-based teams to identify and make plans to remediate environmental health hazards in their schools. **Regardless of the size or wealth of the school districts being trained, four main messages always need to be delivered about improving school IEQ: keep moisture out, keep ventilation systems working as designed, keep buildings clean and reduce exposures to chemical and biological pollutants.**

Many school indoor air quality complaints arise from inadequate housekeeping that fails to remove dirt and dust. School maintenance is routinely underfunded, understaffed and the first to be cut during tough economic times. Schools should be cleaned frequently, thoroughly and effectively and cleaning products and practices are a necessary part of this process. However, the industrial strength cleaning products and room deodorizers that some schools use actually add to indoor air pollution. These products can produce odors and emit a variety of chemicals that are hazardous to the environment and to the health of maintenance workers, students and staff. Conventional cleaning products may contain toxic ingredients that can not only cause rashes, headaches, nausea and dizziness, but can also lead to long-term health problems such as asthma, cancer and lung disease. Many are known to affect the respiratory system, central nervous system, reproduction, development, kidney and liver. Under the US Worker Right to Know Law, school districts are required to provide custodians access to the MSDS sheets of all products they may be exposed to when working. School districts are also required to ensure that all cleaning and maintenance products are properly labeled, that special training for all employees who might be exposed to hazardous products is provided, and that a hazardous response plan is in place for dealing with chemical spills and accidents.

Green Cleaning reduces environmental and health risks by selecting alternative, third-party certified products, by applying these products properly, and by implementing maintenance practices that minimize exposure to cleaning products. Training of school staff is essential to ensure the effectiveness of a school green cleaning program and ConnFESS is pleased to see that ongoing training is a requirement in HB 6496. Custodians need to know how to properly apply, mix, dilute and dispose of these new products and school districts need assistance to transition to effective green cleaning as a part of their indoor air quality (IAQ) programs (CT has required school IAQ programs since 2003). Free Green Cleaning training is currently available from three sources: vendors of Green Seal products, the Cleaning for Health program offered by the CT Department of Public Health (DPH) through the Resource Team and the Cleaning for Healthy Schools Toolkit available online (www.cleaningforhealthyschools.org).

ConnFESS is also pleased to see that so many of HB 6496's proposals parallel or strengthen existing language in other CT state laws dealing with school IAQ, pesticide usage in schools and green cleaning products in state-owned buildings. We were promised when AAC Indoor Air Quality in Schools passed in 2003 that it was just the first step in providing safe and healthy environments for all school occupants. ConnFESS sees HB 6496 as an important second step in the process.

School districts are currently required by An Act Concerning Indoor Air Quality in Schools (CGS Sections 10-220 (a) and (d)) to adopt and implement an IAQ program, to report semiannually on actions taken to implement an IAQ program and/or conduct five year inspections/evaluations at some school facilities. The addition of a required Green Cleaning program to the statutes, along with an updated reporting and inspection process, strengthens existing IAQ programs. Amending the current CT SDE School Facility Survey (ED050) to include questions that assess how green cleaning has been incorporated into school indoor air quality programs provides ongoing documentation needed to ensure some level of compliance. On-line posting of completed ED050 surveys and five year inspection results requires minimal staff time and makes information more readily accessible, in a timely manner, to members of the school community (i.e. Right to Know).

At the beginning of each school year (and during the school year for transfer students and new hires), CT law (CGS Section 10-231) requires local school boards to provide parents, guardians and staff with a written policy on pesticide applications or integrated pest management programs. HB 6496 extends this annual notification to include the school district's Green Cleaning policy, but fails to require notification of staff or new hires and transfer students throughout the school year, which ConnFESS would like to see added. By requiring the adoption, online posting and dissemination of a written policy statement, this proposed law ensures the continuity of green cleaning practices, regardless of changes of district management or administration. The statement "No parent, guardian, teacher or staff member may bring into the school facility any consumer product which is intended to clean, deodorize, sanitize or disinfect." is an essential part of the notification process. Products brought into school that are not certified by an independent third party are a significant barrier to implementing an effective school green cleaning policy and a threat to the health and safety of school occupants.

All CT school children and employees need to be guaranteed a safe school environment, free of preventable health hazards. ConnFESS is very encouraged to see that Raised HB No. 6496 addresses one of the most significant ways to improve IAQ in schools, reducing exposures to chemical pollutants. I thank the co-chairs and the members of the Education Committee for focusing in on this important issue and for this opportunity to testify.

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CT Foundation for Environmentally Safe Schools

A nonprofit organization dedicated to promoting policies, practices and resources that protect school occupants from environmental health hazards

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Green Clean for Schools Campaign - Frequently Asked Questions

What is green cleaning?

There is no legal definition for “green cleaning” and no restriction on the use of the term by manufacturers. The CT Foundation for Environmentally Safe Schools (ConnFESS) defines green cleaning as a 21st century approach to facility maintenance that uses cost-effective cleaning products and practices that protect human health and the environment. Cleaning products containing the least toxic compounds are utilized in combination with advanced technology and equipment that provide superior methods for removing dirt, soil and particulates found in indoor environments.

What kind of green clean policy has been established in Connecticut?

Our state government has already adopted and is now implementing a green clean policy for state buildings. As a result of Executive Order #14 issued by Governor Rell in 2006 and passage of PA 07-100: An Act Concerning the Use of Cleaning Products in State Buildings in 2007, the CT Department of Administrative Services with assistance from the CT Department of Environmental Protection has established green cleaning policies and procedures for state-owned buildings. CT State Vocational Technical Schools must comply with this law since they are state buildings, but all other elementary and secondary schools are not included. Environmentally preferable products must be procured and used for cleaning. Cleaning products regulated by FIFRA (the Federal Insecticide, Fungicide and Rodenticide Act) such as disinfectants, disinfecting cleansers, sanitizers and antimicrobials or products for which no guidelines or environmental standards have been established are specifically excluded from this requirement.

What fiscal impact would the implementation of the proposed school green cleaning law have on local school districts?

The key components for school green clean legislation proposed by the CT Foundation for Environmentally Safe Schools (ConnFESS) in 2009 include requirements that have been proven to save money or to be cost neutral. Requirements include the implementation of cost-effective best practices for green cleaning in schools (see fact sheet) as well as the phase in of environmentally preferable cleaning products certified by an independent third party such as Green Seal, Inc. and EcoLogo. Training in green cleaning for schools is available at no cost from a variety of sources. The transition to these environmentally preferable products will be assisted by the expertise already developed by the CT Department of Administrative Services pursuant to PA 07-100 as well as the purchasing power of the state to reduce costs for local school districts pursuant to PA 08-0002. Given the economic prognosis for the 2009 legislative session, unfunded mandates that would have required school districts to purchase advanced technology and equipment such as HEPA vacuums or high filtration floor buffer systems used in the most effective school green cleaning programs were not included in this proposed legislation.

What is an environmentally preferable product?

When defined by the federal government (Executive Order 13101), environmentally preferable products “means products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose. This comparison may consider raw materials acquisition, production, manufacturing, packaging, distribution, reuse, operation, maintenance or disposal of the product or service.”

Why is third-party certification of environmentally preferable products essential?

Many manufacturers and retailers are using terms such as “environmentally safe”, “green” or “non-toxic” to boost sales. Some of these claims may be true, but many are not. In order to ensure the health and safety of school children and employees as well as the effectiveness of these products, certification from third-party organizations such as Green Seal and EcoLogo is a must. Both of these third-party organizations have certified a vast array of high performing maintenance products suitable for use in school facilities.

What criteria should third-party certifying organizations meet?

In order to ensure the integrity of a third-party organization it must:

- Have an open, transparent process for setting standards that involves the public and key stakeholders;
- Clearly define the fees a manufacturer must pay for certification;
- Clearly identify any potential conflicts of interest;
- Have criteria for certification be publicly available and transparent;
- Base certification on consideration of human health and safety, ecological toxicity, other environmental impacts, and resource conservation, as appropriate, for the product and its packaging, on a life cycle basis;
- Require periodic revisions and updates of the standards;
- Monitor and enforce the standards, provide for the authority to inspect the manufacturing facilities, and periodically do so;
- Have a registered/legally protected certification mark;
- Make the standards easily accessible to purchasers and manufacturers (e.g. available for download on the program’s website);
- Be developed by consensus, if possible;
- Establish leadership levels in standards for products.

How is the US Environmental Protection Agency’s Design for the Environment or DfE different from Green Seal?

Design for the Environment (DfE) does not meet the criteria for third-party certification. The DfE team reviews ingredients in products for potential health and environmental issues and recommends safer alternatives for toxic chemicals. They do not verify what ends up in the product and do not inspect the manufacturer’s facility. In order to use the DfE logo, manufacturers simply sign a pledge stating they will use safer ingredients.

How is the GS-37 Green Seal, Inc. standard for general purpose cleaners helpful to school facilities managers?

GS-37 is a standard developed and periodically updated by Green Seal, Inc. that identifies general purpose cleaners, restroom, glass and carpet cleaners that are “environmentally preferable”. Cleaners covered by GS-37 are intended for routine use by institutions, warehouses and industrial facilities as well as schools, day-care centers and nursing homes. GS-37 does not apply to air fresheners, disinfectants or sanitizers.

The GS-37 standard enables school facilities managers to readily find and use safer alternatives to toxic cleaning chemicals without becoming an expert in the chemical analysis of cleaning chemicals. *Vendors of GS-37 products are required to provide free training to customers on the proper use of their cleaners.*

How does the recent fourth edition of the GS-37 standard provide better protection for school children and employees?

The newly adopted standard (August 2008) is more protective of vulnerable populations such as children, women of childbearing age, women who are pregnant or breastfeeding and immunocompromised individuals. Specific asthmagens (Diethanolamine and Triethanolamine) that cause asthma and phthalates will be eliminated from GS-37 cleaning products. The new standard also tightens restrictions for volatile organic compounds and pH levels while continuing to prohibit carcinogens.

What is the Cleaning for Health program?

The CT School Indoor Environment Resource Team is now offering a green cleaning program entitled Cleaning for Health. This program was developed to reduce asthma triggers and other adverse health effects from industrial cleaning. Cleaning for Health is an educational and technical assistance program designed to help schools transition to a new generation of less toxic cleaning chemicals and to adopt state-of-the-art cleaning practices. It focuses on three key concepts:

1. less toxic cleaning products certified by a third party as environmentally preferable
2. high filtration cleaning equipment
3. best practices

For further information, contact Kenny Foscue at 860-509-7740 at the CT Dept. of Public Health.

What is the Cleaning for Healthy Schools program?

This is an online toolkit that was developed by the National Collaborative Work Group on Green Cleaning and Chemical Policy Reform in Schools. Members of this work group include Healthy Schools Network, American Lung Association of New England, The Green Schools Initiative, National Association of School Nurses, INFORM and MassCOSH. The Toolkit has easy-to-use learning modules designed to introduce all audiences to the concept of green clean and Cleaning for Healthy Schools. The Cleaning for Healthy Schools Toolkit (www.cleaningforhealthyschools.org) is an open-source, industry-free, customizable, comprehensive program to safeguard human health, reduce exposure to chemicals and cost-effectively improve the performance of cleaning programs.